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June 27, 2006

BY OVERNIGHT DELIVERY AND E-FILE

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's responses to the following Information Requests:

From the UWUA:

UWUA-1-1   UWUA-1-2   UWUA-1-3   UWUA-1-4 (BULK)

UWUA-1-6   UWUA-1-7   UWUA-1-8   UWUA-1-9   UWUA-1-10

UWUA-1-11   UWUA-1-12

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc:    Alexander Cochis, Assistant Attorney General (4 copies)  
      Charles Harak, Esq. (UWUA)  
      Nicole Horberg Decter, Esq. (USW)  
      John K. Habib, Esq. (NSTAR)  
      James Avery, Esq. (Berkshire Gas Company)

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

- UWUA 1-1: (a) Please list the name and job title of each person at NiSource or NiSource-affiliate to whom Mr. Bryant reports. Include a summary description of the matters which Mr. Bryant would report on or discuss with each person named in this answer.
- (b) To the extent not covered in (a), please list the name and job title of each person at NiSource or NiSource-affiliate with whom Mr. Bryant regularly or periodically confers regarding staffing requirements or staffing levels, service quality, investment in infrastructure, outsourcing, labor relations, or regulatory affairs, defining "regularly or periodically confers" to include individuals with whom Mr. Bryant communicates two or more times per year.

- RESPONSE: (a) Mr. Bryant interprets the word "report" to mean to whom in the organizational chain he reports. Mr. Bryant is a direct report of Kathleen O'Leary, Executive Vice President of Energy Distribution Regulated Revenue. All matters under Mr. Bryant's purview as President of Bay State Gas Company that are significant enough to report to Senior Management would be presented to Ms. O'Leary.
- (b) The question is simply too broad. The referenced areas are central to the safe, proper and low cost operation of a regulated utility such as Bay State. Mr. Bryant is President of Bay State and responsible for each of these areas. Accordingly, consistent with the regular and usual course of his business activities, Mr. Bryant has had contact with virtually every manager in Bay State in the areas referenced in this request, and many employees would be also be included in one or more area. Managers and personnel from Northern Utilities may be included as well because of certain shared services. Managers and employees of NiSource Corporate Services (Finance, HR, Insurance, Tax, Real Estate, Operations, etc.) would also fall under multiple portions of this request. Finally, managers of affiliated distribution companies may also be included in a response to this request. In sum, the "contacts" requested (established at contacts made two times or more a year), even if they could be recalled and compiled with any certainty, would likely number in the hundreds.

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

UWUA 1-2: Please provide a copy of any customer satisfaction surveys of the customers of Bay State or any NiSource affiliate or subsidiary completed during 2005 or 2006. Include University of Michigan survey, American Customer Satisfaction Index survey, or J.D. Powers survey that included customers of any NiSource affiliate or subsidiary.

RESPONSE: Objection. Customer satisfaction surveys for any entity other than Bay State is irrelevant to this proceeding, where Bay State's service quality and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. The level of customer satisfaction with any other affiliate's service is irrelevant to *Bay State's* ability to serve *its* customers.

Notwithstanding this objection, but rather, specifically maintaining it, please see Attachments UWUA-1-2 (A) through (E), which provide the five most currently available Bay State customer satisfactions surveys.

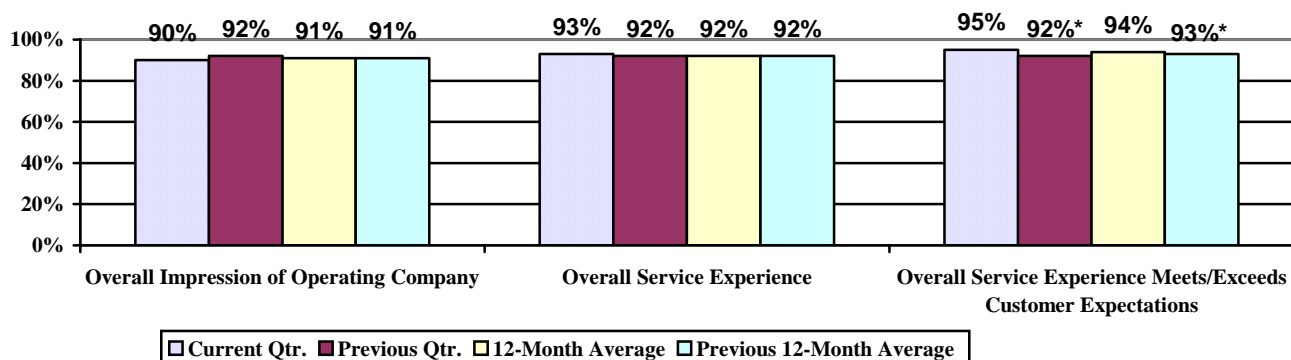
## Customer Service Tracking Study Report

1st Quarter 2006

### -- BSG-MA --

## Primary Measures of Service Quality

(Percent Rating "6" or Higher on Ten-Point Scale)



## Key Drivers of Satisfaction with Overall Service Experience

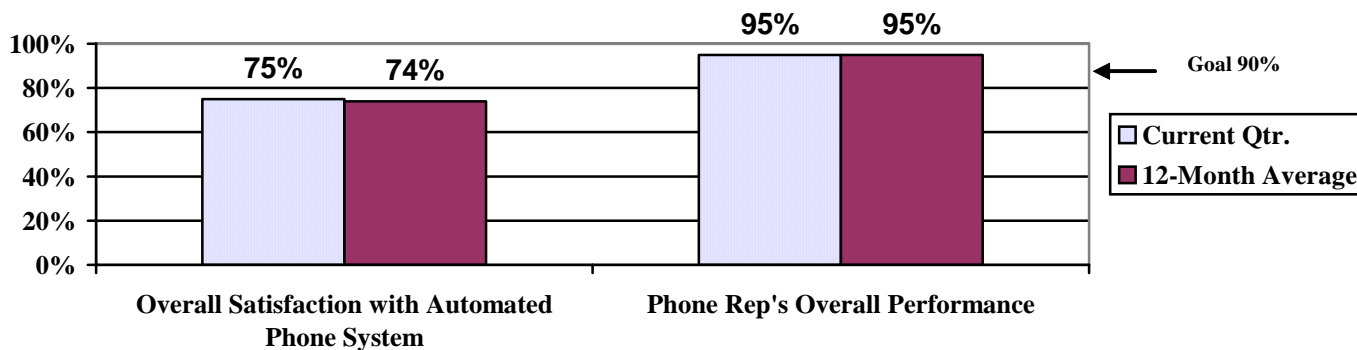
	BSG-MA		Change	
	Current Qtr.	12-Month Average	Previous Qtr.	12-Month Average
Phone rep showing concern for customer's situation	94%	94%	1%	0%
Overall service experience meeting or exceeding customer expectations	95%	94%	4% *	2%
Overall ease of contacting company to discuss situation	89%	90%	-1%	-1%
Phone rep having necessary authority to make decisions	94%	93%	1%	1%
Amount of time it took to complete transaction on IVRU	53%	75%	-47% *	-22%
Variety of services and information offered on IVRU	82%	82%	1%	1%

Percentage of Customers Rating "6" or Higher on Ten-Point Scale (unless otherwise noted)

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

## Overall Satisfaction with Telephone Service

(Percent Rating "6" or Higher on Ten-Point Scale)





### Automated Telephone System/Access to Reps

	Current Qtr.	Change from Previous Quarter
Variety of services and information offered	82%	1%
Ease of understanding menu options and directions	84%	-1%
Amount of time took to get to desired menu option	76%	-3%
Time to complete automated transaction	53%	-47% *
Overall ease of contacting company	89%	-1%
Amount of time spent waiting	85%	2%

### Telephone Rep Service

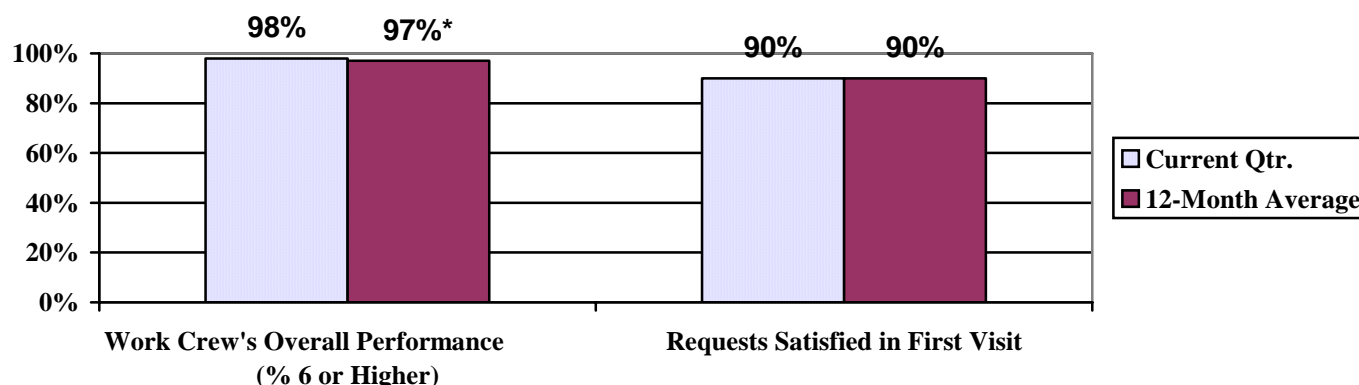
	Current Qtr.	Change from Previous Quarter
Being courteous and professional	95%	-2%
Treating you as respected customer	96%	1%
Showing interest and concern	94%	1%
Displaying skill and knowledge	95%	0%
Adequately answering questions	93%	-1%
Understanding purpose of call	96%	3%
Having authority to make decisions	94%	1%
Handling request quickly/efficiently	95%	2%

Percent rating "6" or higher on ten-point scale

 <p><b>Percentage of Cases Resolved with One Call</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>70%</td> <td>70%</td> </tr> </table>	Current Qtr.	12-Month Average	70%	70%	 <p><b>Percent Rating Phone Service as Better/Same as Peer Utilities</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>82%</td> <td>79%</td> </tr> </table>	Current Qtr.	12-Month Average	82%	79%
Current Qtr.	12-Month Average								
70%	70%								
Current Qtr.	12-Month Average								
82%	79%								

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

## Satisfaction with Service Visit





### Scheduling Service Visit

	Current Qtr.	Change from Previous Quarter
Scheduling to meet customer needs	94%	7% *
Telling you when work would take place	95%	4% *
Work crew arriving on time	97%	2%

Percent rating "6" or higher on ten-point scale

### Work Crew Performance

	Current Qtr.	Change from Previous Quarter
Being pleasant and courteous	100%	2% *
Displaying skill and knowledge	99%	2% *
Taking time to explain work	98%	2%
Adequately answering questions	99%	3% *
Being informed about your request	97%	2%
Performing work quickly and efficiently	99%	2% *
Leaving work area neat and safe	98%	0%

	<b>Field Service Rep/Work Crew Displaying Skill and Knowledge</b>			<b>Percent Rating Service Visit as Better/Same as Peer Utilities</b>	
	<u>Current Qtr.</u>	<u>12-Month Average</u>		<u>Current Qtr.</u>	<u>12-Month Average</u>
	<b>99%</b>	<b>97%*</b>		<b>N/A</b>	<b>N/A</b>

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

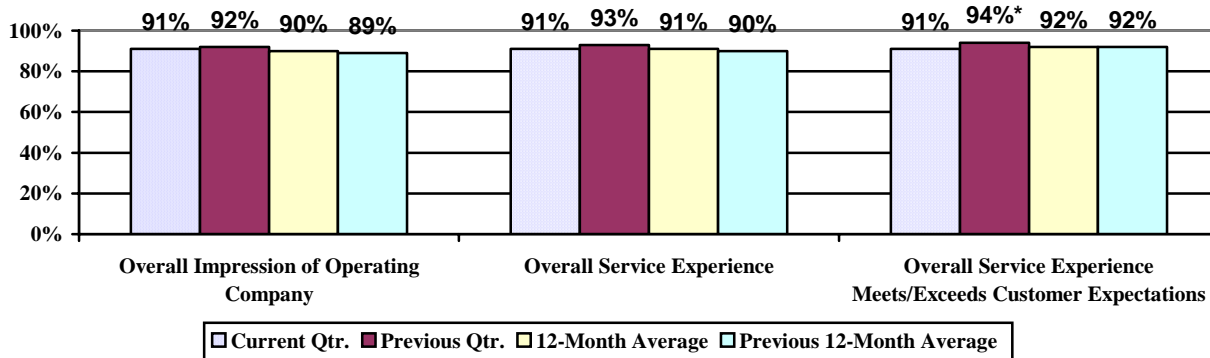
**Customer Service Tracking Study Report**

**4th Quarter 2005**

**-- Bay State Gas --**

**Primary Measures of Service Quality**

(Percent Rating "6" or Higher on Ten-Point Scale)



**Key Drivers of Satisfaction with Overall Service Experience**

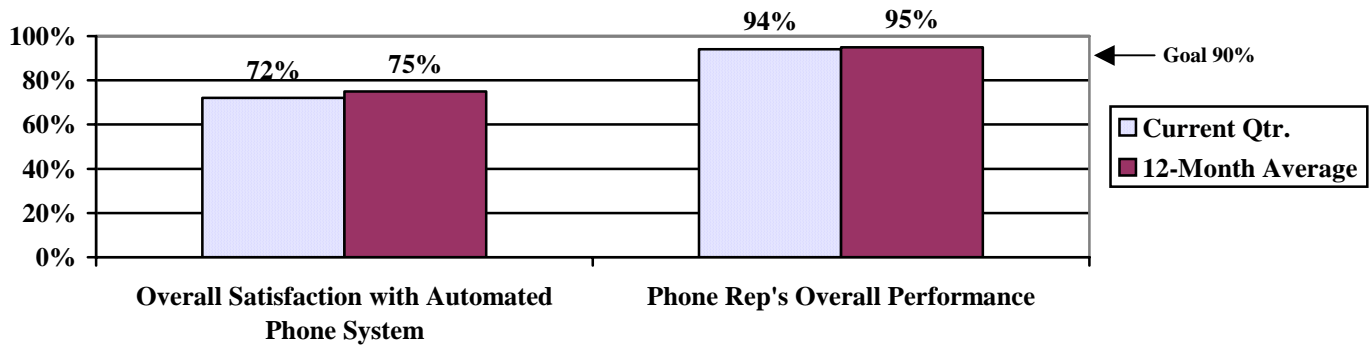
	Bay State Gas		Change	
	Current Qtr.	12-Month Average	Previous Qtr.	12-Month Average
Phone rep taking care of request quickly and efficiently	92%	94%	-4% *	-2%
Overall service experience meeting or exceeding customer expectations	91%	92%	-3% *	-2%
Overall ease of contacting company to discuss situation	89%	91%	0%	-2%
Phone rep having necessary authority to make decisions	93%	93%	0%	0%
Amount of time it took to complete transaction on IVRU	100%	89% *	27% *	11%
Overall performance of sales rep/ field service rep or work crew	95%	96%	-2%	-1%

Percentage of Customers Rating "6" or Higher on Ten-Point Scale (unless otherwise noted)

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

## Overall Satisfaction with Telephone Service

(Percent Rating "6" or Higher on Ten-Point Scale)



### Automated Telephone System/Access to Reps

	Current Qtr.	Change from Previous Quarter
Variety of services and information offered	81%	1%
Ease of understanding menu options and directions	85%	0%
Amount of time took to get to desired menu option	78%	-2%
Time to complete automated transaction	100%	27% *
Overall ease of contacting company	89%	0%
Amount of time spent waiting	83%	-6% *

### Telephone Rep Service

	Current Qtr.	Change from Previous Quarter
Being courteous and professional	96%	-2% *
Treating you as respected customer	95%	-2%
Showing interest and concern	93%	-3%
Displaying skill and knowledge	95%	-2%
Adequately answering questions	94%	-2%
Understanding purpose of call	94%	-3%
Having authority to make decisions	93%	0%
Handling request quickly/efficiently	92%	-4% *

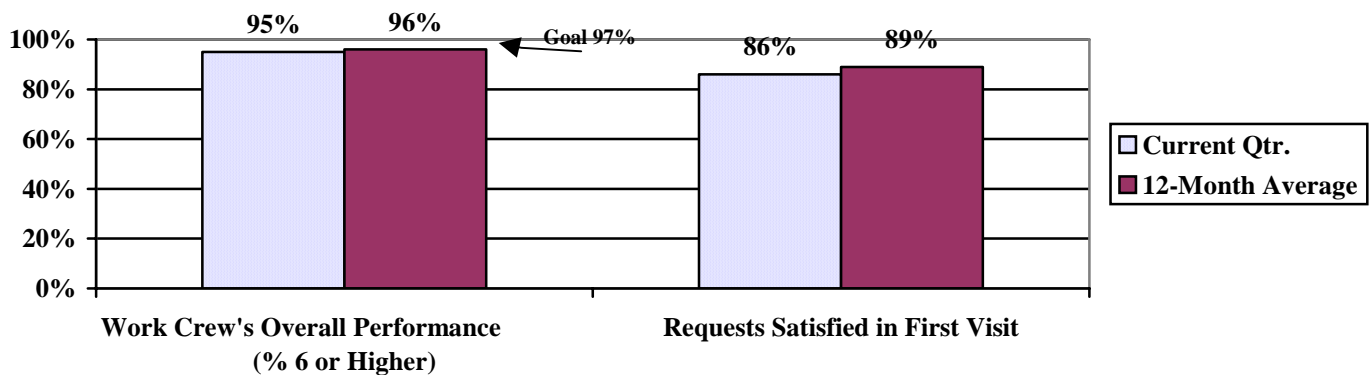
Percent rating "6" or higher on ten-point scale

	<b>Percentage of Cases Resolved with One Call</b>		<b>Percent Rating Phone Service as Better/Same as Peer Utilities</b>
	<div>Current Qtr.</div> <div>12-Month Average</div>		<div>Current Qtr.</div> <div>12-Month Average</div>
	<div>68%</div> <div>70%</div>		<div>80%</div> <div>80%</div>

\* Indicates a statistically significant difference from current quarter at 95% confidence level.



## Satisfaction with Service Visit





### Scheduling Service Visit

	Current Qtr.	Change from Previous Quarter
Scheduling to meet customer needs	87%	-7% *
Telling you when work would take place	91%	-4% *
Work crew arriving on time	95%	-1%

Percent rating "6" or higher on ten-point scale

### Work Crew Performance

	Current Qtr.	Change from Previous Quarter
Being pleasant and courteous	98%	-1%
Displaying skill and knowledge	97%	-1%
Taking time to explain work	96%	1%
Adequately answering questions	96%	-2%
Being informed about your request	96%	-1%
Performing work quickly and efficiently	97%	0%
Leaving work area neat and safe	98%	1%

 <p><b>Field Service Rep/Work Crew Displaying Skill and Knowledge</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td><b>97%</b></td> <td><b>97%</b></td> </tr> </table>	Current Qtr.	12-Month Average	<b>97%</b>	<b>97%</b>	 <p><b>Percent Rating Service Visit as Better/Same as Peer Utilities</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td><b>N/A</b></td> <td><b>N/A</b></td> </tr> </table>	Current Qtr.	12-Month Average	<b>N/A</b>	<b>N/A</b>
Current Qtr.	12-Month Average								
<b>97%</b>	<b>97%</b>								
Current Qtr.	12-Month Average								
<b>N/A</b>	<b>N/A</b>								

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

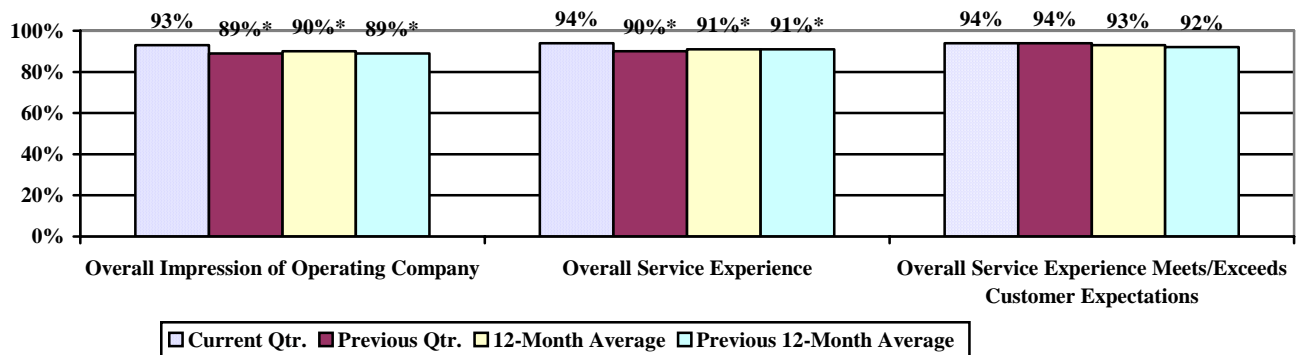
## Customer Service Tracking Study Report

3rd Quarter 2005

### -- BSG-MA --

## Primary Measures of Service Quality

(Percent Rating "6" or Higher on Ten-Point Scale)



## Key Drivers of Satisfaction with Overall Service Experience

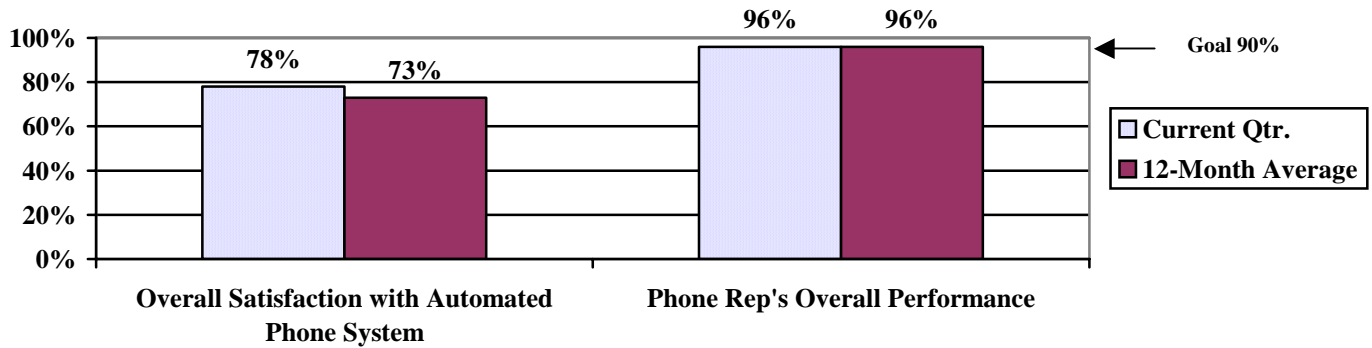
	BSG-MA		Change	
	Current Qtr.	12-Month Average	Previous Qtr.	12-Month Average
Phone rep taking care of request quickly and efficiently	97%	94%	2%	2%
Overall service experience meeting or exceeding customer expectations	94%	93%	1%	2%
Overall ease of contacting company to discuss situation	90%	91%	-1%	-1%
Phone rep having necessary authority to make decisions	94%	92%	1%	2%
Amount of time it took to complete transaction on IVRU	77%	86%	-16%	-9%
Overall performance of sales rep/ field service rep or work crew	98%	96%	1%	1%

Percentage of Customers Rating "6" or Higher on Ten-Point Scale (unless otherwise noted)

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

## Overall Satisfaction with Telephone Service

(Percent Rating "6" or Higher on Ten-Point Scale)





### Automated Telephone System/Access to Reps

	Current Qtr.	Change from Previous Quarter
Variety of services and information offered	80%	-2%
Ease of understanding menu options and directions	86%	5%
Amount of time took to get to desired menu option	80%	4%
Time to complete automated transaction	77%	-16%
Overall ease of contacting company	90%	-1%
Amount of time spent waiting	89%	5%

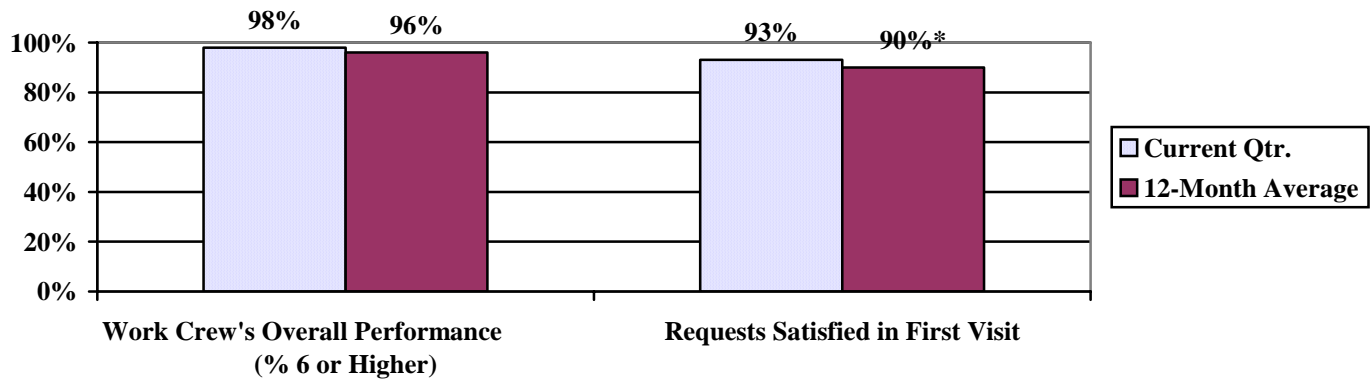
Percent rating "6" or higher on ten-point scale

### Telephone Rep Service

	Current Qtr.	Change from Previous Quarter
Being courteous and professional	99%	2%
Treating you as respected customer	98%	1%
Showing interest and concern	96%	3%
Displaying skill and knowledge	97%	0%
Adequately answering questions	96%	-1%
Understanding purpose of call	97%	1%
Having authority to make decisions	94%	1%
Handling request quickly/efficiently	97%	2%

 <p><b>Percentage of Cases Resolved with One Call</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>76%</td> <td>72%</td> </tr> </table>	Current Qtr.	12-Month Average	76%	72%	 <p><b>Percent Rating Phone Service as Better/Same as Peer Utilities</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>76%</td> <td>81%</td> </tr> </table>	Current Qtr.	12-Month Average	76%	81%
Current Qtr.	12-Month Average								
76%	72%								
Current Qtr.	12-Month Average								
76%	81%								

## Satisfaction with Service Visit





### Scheduling Service Visit

	Current Qtr.	Change from Previous Quarter
Scheduling to meet customer needs	94%	1%
Telling you when work would take place	95%	0%
Work crew arriving on time	96%	0%

Percent rating "6" or higher on ten-point scale

### Work Crew Performance

	Current Qtr.	Change from Previous Quarter
Being pleasant and courteous	99%	1%
Displaying skill and knowledge	98%	1%
Taking time to explain work	96%	2%
Adequately answering questions	98%	3%*
Being informed about your request	97%	3%
Performing work quickly and efficiently	98%	3%*
Leaving work area neat and safe	97%	-1%

	<b>Field Service Rep/Work Crew Displaying Skill and Knowledge</b>			<b>Percent Rating Service Visit as Better/Same as Peer Utilities</b>	
	<u>Current Qtr.</u>	<u>12-Month Average</u>		<u>Current Qtr.</u>	<u>12-Month Average</u>
	<b>98%</b>	<b>97%</b>		<b>N/A</b>	<b>N/A</b>

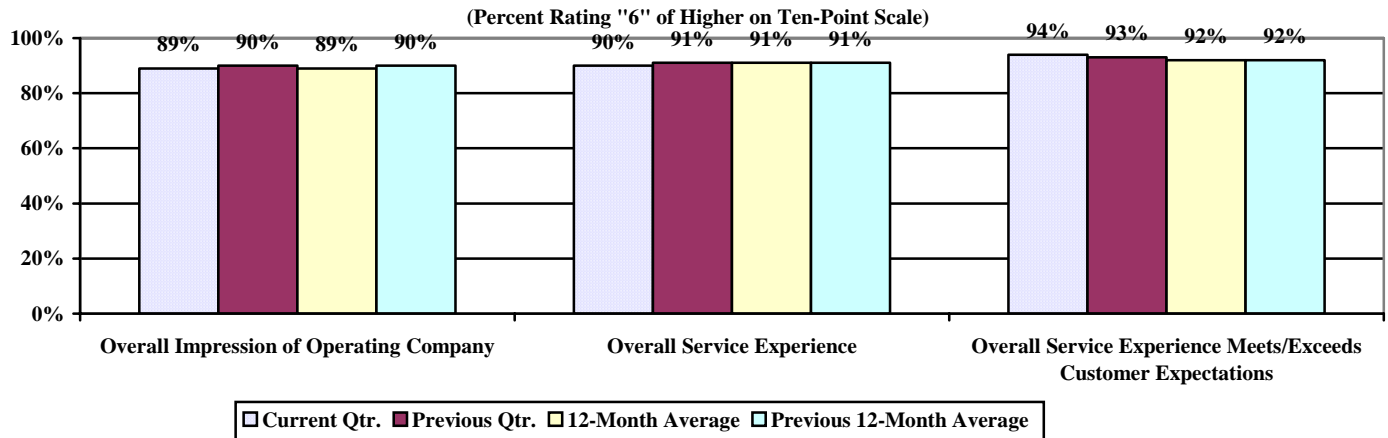
\* Indicates a statistically significant difference from current quarter at 95% confidence level.

**Customer Service Tracking Study Report**

**2nd Quarter 2005**

**-- BSG-MA --**

**Primary Measures of Service Quality**



***Key Drivers of Satisfaction with Overall Service Experience***

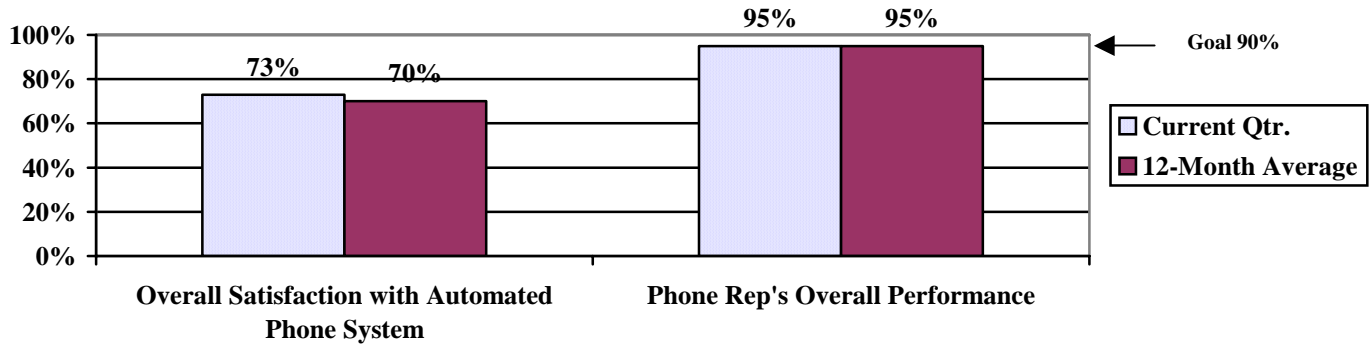
	BSG-MA		Change	
	Current Qtr.	12-Month Average	Previous Qtr.	12-Month Average
Phone rep taking care of request quickly and efficiently	94%	94%	0%	+1%
Overall service experience meeting or exceeding customer expectations	94%	92%	+1%	+1%
Overall ease of contacting company to discuss situation	91%	91%	-4%*	0%
Phone rep having necessary authority to make decisions	92%	92%	0%	0%
Amount of time it took to complete transaction on IVRU	93%	93%	+2%	0%
Overall performance of sales rep/ field service rep or work crew	97%	96%	+1%	0%

Percentage of Customers Rating "6" or Higher on Ten-Point Scale (unless otherwise noted)

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

## Overall Satisfaction with Telephone Service

(Percent Rating "6" or Higher on Ten-Point Scale)





### Automated Telephone System/Access to Reps

	Current Qtr.	Change from Previous Quarter
Variety of services and information offered	82%	0%
Ease of understanding menu options and directions	81%	-3%
Amount of time took to get to desired menu option	76%	-5%
Time to complete automated transaction	93%	+2%
Overall ease of contacting company	91%	-4% *
Amount of time spent waiting	84%	-7% *

Percent rating "6" or higher on ten-point scale

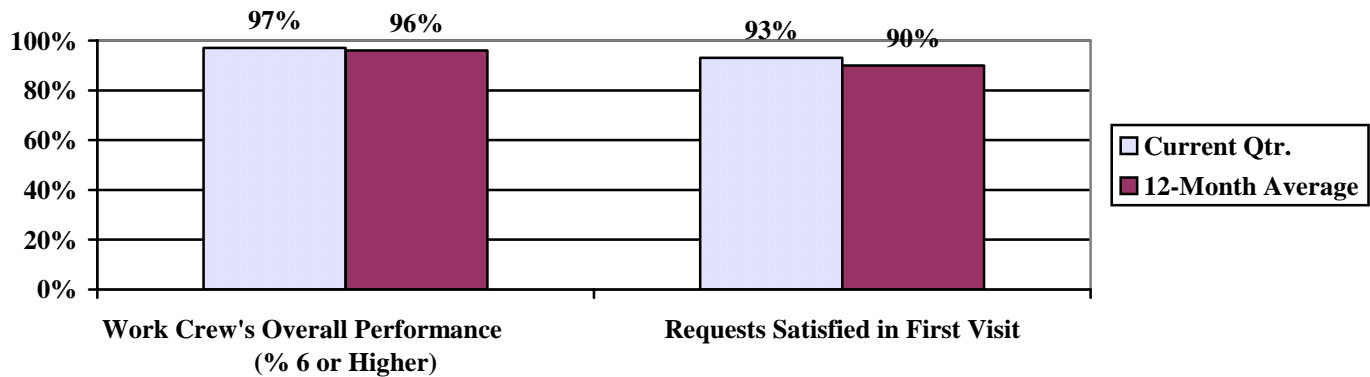
### Telephone Rep Service

	Current Qtr.	Change from Previous Quarter
Being courteous and professional	96%	-1%
Treating you as respected customer	97%	+1%
Showing interest and concern	93%	0%
Displaying skill and knowledge	97%	0%
Adequately answering questions	97%	0%
Understanding purpose of call	96%	0%
Having authority to make decisions	92%	0%
Handling request quickly/efficiently	94%	0%

	<b>Percentage of Cases Resolved with One Call</b>			<b>Percent Rating Phone Service as Better/Same as Peer Utilities</b>	
	<u>Current Qtr.</u>	<u>12-Month Average</u>		<u>Current Qtr.</u>	<u>12-Month Average</u>
	72%	71%		79%	82%

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

## Satisfaction with Service Visit





### Scheduling Service Visit

	Current Qtr.	Change from Previous Quarter
Scheduling to meet customer needs	93%	0%
Telling you when work would take place	95%	+1%
Work crew arriving on time	95%	+1%

Percent rating "6" or higher on ten-point scale

### Work Crew Performance

	Current Qtr.	Change from Previous Quarter
Being pleasant and courteous	98%	0%
Displaying skill and knowledge	96%	0%
Taking time to explain work	94%	-2%
Adequately answering questions	96%	-2%
Being informed about your request	94%	-3%
Performing work quickly and efficiently	95%	-2%
Leaving work area neat and safe	98%	+2%

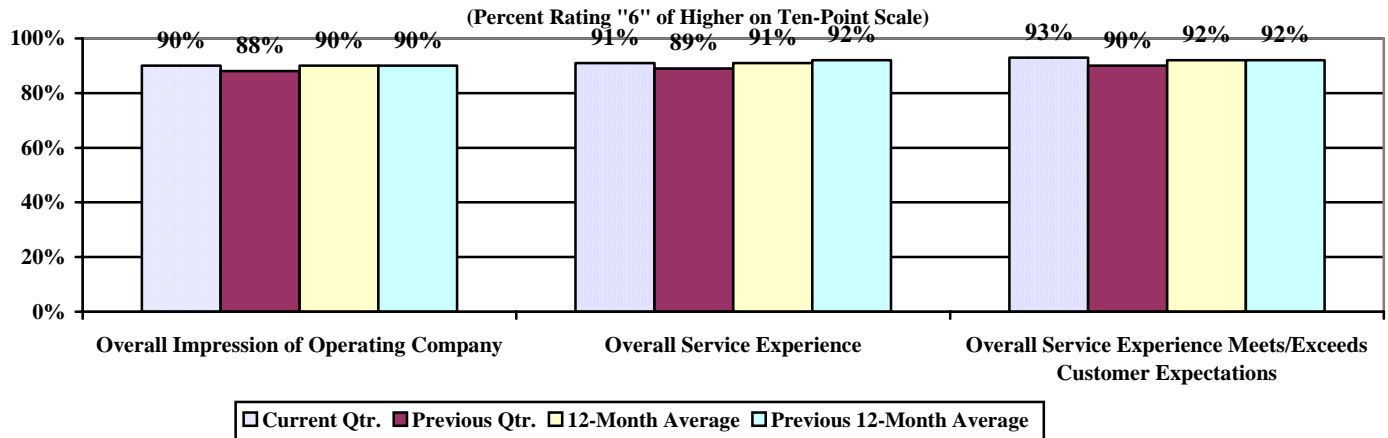
 <p><b>Field Service Rep/Work Crew Displaying Skill and Knowledge</b></p> <table> <tr> <th><u>Current Qtr.</u></th><th><u>12-Month Average</u></th></tr> <tr> <td><b>96%</b></td><td><b>97%</b></td></tr> </table>	<u>Current Qtr.</u>	<u>12-Month Average</u>	<b>96%</b>	<b>97%</b>	 <p><b>Percent Rating Service Visit as Better/Same as Peer Utilities</b></p> <table> <tr> <th><u>Current Qtr.</u></th><th><u>12-Month Average</u></th></tr> <tr> <td><b>N/A</b></td><td><b>N/A</b></td></tr> </table>	<u>Current Qtr.</u>	<u>12-Month Average</u>	<b>N/A</b>	<b>N/A</b>
<u>Current Qtr.</u>	<u>12-Month Average</u>								
<b>96%</b>	<b>97%</b>								
<u>Current Qtr.</u>	<u>12-Month Average</u>								
<b>N/A</b>	<b>N/A</b>								

**Customer Service Tracking Study Report**

**1st Quarter 2005**

**-- BSG-MA --**

**Primary Measures of Service Quality**



***Key Drivers of Satisfaction with Overall Service Experience***

	BSG-MA		Change	
	Current Qtr.	12-Month Average	Previous Qtr.	12-Month Average
Phone rep taking care of request quickly and efficiently	95%	94%	+2%	+1%
Overall service experience meeting or exceeding customer expectations	93%	92%	+2%	+1%
Overall ease of contacting company to discuss situation	95%	91%	+7%*	+4%*
Phone rep having necessary authority to make decisions	93%	92%	+2%	0%
Amount of time it took to complete transaction on IVRU	91%	92%	+3%	+2%
Overall performance of sales rep/ field service rep or work crew	96%	96%	0%	-1%

Percentage of Customers Rating "6" or Higher on Ten-Point Scale (unless otherwise noted)

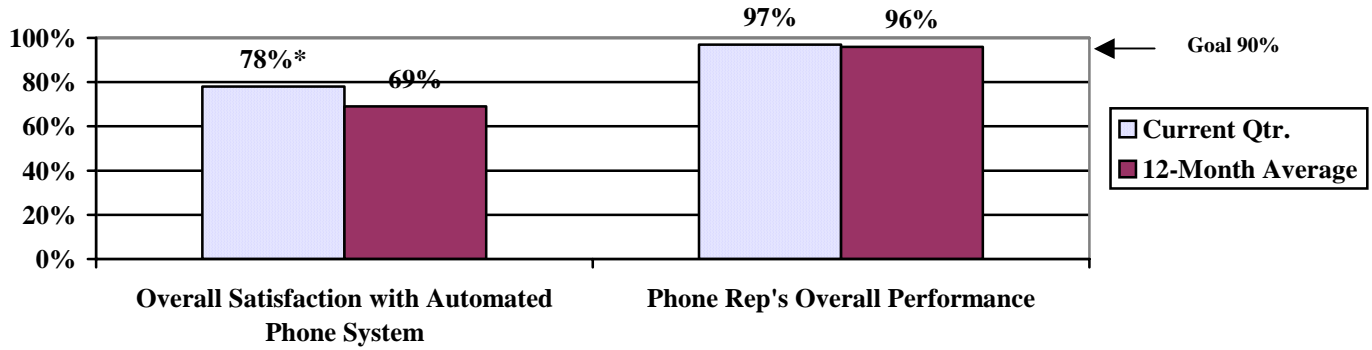
- One driver of overall satisfaction, overall ease of contacting company, showed a significant increase compared to the previous quarter and to the 12 month average.

\* Indicates a statistically significant difference from current quarter at 95% confidence level.



## Overall Satisfaction with Telephone Service

(Percent Rating "6" or Higher on Ten-Point Scale)



- Overall satisfaction with Automated Phone System showed marked increase versus the 12-month average.

### Automated Telephone System/Access to Reps



	Current Qtr.	Change from Previous Quarter
Variety of services and information offered	83%	+5%
Ease of understanding menu options and directions	84%	+2%
Amount of time took to get to desired menu option	81%	+6%
Time to complete automated transaction	91%	+3%
Overall ease of contacting company	95%	+7%*
Amount of time spent waiting	90%	+4%

Percent rating "6" or higher on ten-point scale

### Telephone Rep Service

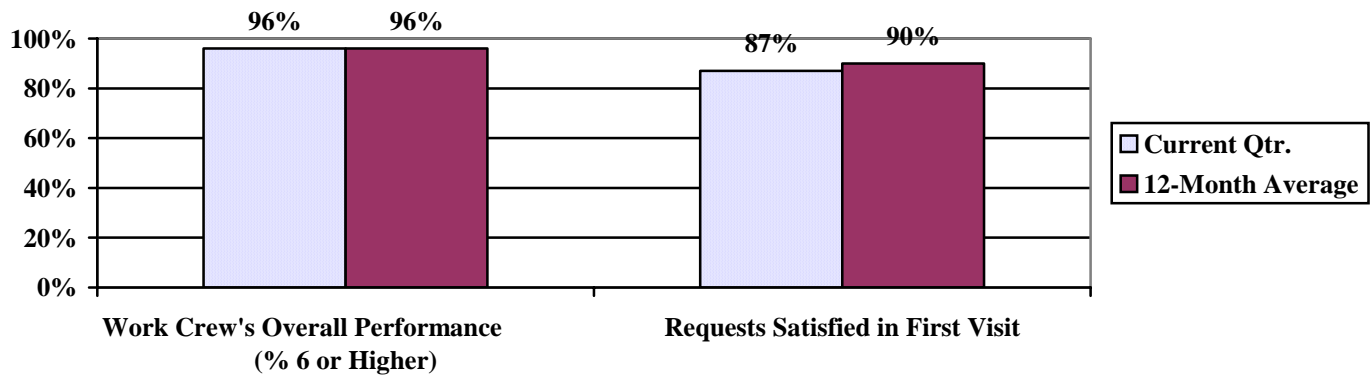
	Current Qtr.	Change from Previous Quarter
Being courteous and professional	98%	+2%
Treating you as respected customer	96%	0%
Showing interest and concern	93%	+1%
Displaying skill and knowledge	96%	+4%*
Adequately answering questions	96%	+3%
Understanding purpose of call	96%	+2%
Having authority to make decisions	93%	+2%
Handling request quickly/efficiently	95%	+2%

- A significantly higher percentage of ratings "6" or higher were given to "ease of contacting company" and "telephone rep skill and knowledge".

 <p><b>Percentage of Cases Resolved with One Call</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>68%</td> <td>72%</td> </tr> </table>	Current Qtr.	12-Month Average	68%	72%	 <p><b>Percent Rating Phone Service as Better/Same as Peer Utilities</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>86%</td> <td>84%</td> </tr> </table>	Current Qtr.	12-Month Average	86%	84%
Current Qtr.	12-Month Average								
68%	72%								
Current Qtr.	12-Month Average								
86%	84%								

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

## Satisfaction with Service Visit



### Scheduling Service Visit



	Current Qtr.	Change from Previous Quarter
Scheduling to meet customer needs	94%	+5% *
Telling you when work would take place	94%	+6% *
Work crew arriving on time	95%	+5% *

Percent rating "6" or higher on ten-point scale

### Work Crew Performance

	Current Qtr.	Change from Previous Quarter
Being pleasant and courteous	98%	0%
Displaying skill and knowledge	97%	-1%
Taking time to explain work	96%	+2%
Adequately answering questions	97%	+2%
Being informed about your request	97%	+4% *
Performing work quickly and efficiently	97%	+1%
Leaving work area neat and safe	96%	-3%

- All attributes regarding scheduling a service visit showed a significant increase compared to the previous quarter. A significantly higher percentage of ratings "6" or higher were given for work crew being informed about customer's request.

 <p><b>Field Service Rep/Work Crew Displaying Skill and Knowledge</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>97%</td> <td>97%</td> </tr> </table>	Current Qtr.	12-Month Average	97%	97%	 <p><b>Percent Rating Service Visit as Better/Same as Peer Utilities</b></p> <table> <tr> <th>Current Qtr.</th> <th>12-Month Average</th> </tr> <tr> <td>N/A</td> <td>N/A</td> </tr> </table>	Current Qtr.	12-Month Average	N/A	N/A
Current Qtr.	12-Month Average								
97%	97%								
Current Qtr.	12-Month Average								
N/A	N/A								

\* Indicates a statistically significant difference from current quarter at 95% confidence level.

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

UWUA 1-3: Please list the dates and subject matters of any in-person meetings or telephone calls (to the extent logged or known) between (i) Steve Bryant, Dan Cote, any NiSource or NiSource-affiliate employees or agents, or any lobbyists or regulatory affairs consultants for Bay State or NiSource and (ii) any of the Department's commissioners or staff, between the dates December 1, 2005 and the date of answering this information request.

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Moreover the request constitutes a fishing expedition and is overbroad; as a jurisdictional utility, Mr. Bryant, Mr. Cote, and Bay State's operational communications and administration managers, employees, agents, lawyers and consultants have hundreds of "in-person meetings or telephone calls" with the Department management or staff over the course of a year. Bay State policies require each such contact to be consistent with the Department's policies and procedures and the laws of the Commonwealth.

Notwithstanding this objection, but rather specifically maintaining it, Mr. Bryant will state that he recalls that he has had telephonic conversations with certain Department Commissioners regarding various operational or regulatory issues in the referenced time period.

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

**Bulk Response**

UWUA 1-4: Please provide a copy of any written correspondence, e-mails or notes of any kind sent to or received from the Department, for the period January 1, 2005 to date, regarding in any manner: the operation of the companies gas storage, production or distribution facilities; safety procedures, compliance with rules, regulations, or guidance of the Department or any other state or federal agency; or compliance with the company's own operations manuals or guidelines.

RESPONSE: Please see Attachment UWUA 1-4 for copies of currently available written correspondence, e-mails or notes sent to or received from the Department, for the period January 1, 2005 to date, regarding the operation and safety of Bay State Gas distribution facilities, and compliance issues related to the same. For purposes of administrative ease, given the voluminous nature of this response, the Company only included a sample of the Report of Utilities Services Incident ("Incident Report"), which was dated April 27, 2006. Copies of all other Incident Reports, which total approximately 500 pages, are available upon request. The Company continues to search for relevant written correspondence, and will supplement this response if any additional information becomes available.

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

UWUA 1-6: Please state the location(s) where Bay State or NiSource processes pay roll checks for Bay State employees. Also include the location where personnel files for Bay State employees are maintained.

RESPONSE: Bay State payroll is administratively processed in San Jose, Costa Rica. Checks are printed and distributed in Merrillville, IN. Personnel files for Bay State employees are maintained in Hammond, IN.

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

- UWUA 1-7: (a) Please explain how Bay State and/or NiSource establish a Bay State budget for the ensuing fiscal year, including which personnel at Bay State and NiSource are involved and the process by which the company proceeds from initial discussions to a finalized budget. To the extent there are different budgets (e.g., capital versus operating), including a separate description for each such budget.
- (b) Include a copy of the budgets for the budget periods most closely corresponding to calendar 2005, 2006 and, if available, 2007, and any revisions to those budgets.

- RESPONSE: (a) Attachment UWUA 1-07 (A) is a description of the capital budgeting process. Attachment UWUA 1-07 (B) is a description of the operating budget process.
- (b) Attachment UWUA 1-07 (C) is the Bay State capital budgets for 2005 and 2006. Attachment UWUA 1-07 (D) is the operating budgets for 2005 and 2006. The 2007 capital and operating budgets are not yet available.

COMMONWEALTH OF MASSACHUSETTS  
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RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

UWUA 1-8: Please provide a copy of all communications (including but not limited to e-mails, memos, notes and logs of telephone calls) between or among Steve Bryant, Dan Cote and any other Bay State or NiSource employee, advisor or consultant, regarding the oversight hearings held by Senator Marc Pacheco of the Senate Post-Audit and Oversight Committee on or about November 4, 2005.

RESPONSE: Objection. The question constitutes a fishing expedition and is irrelevant to this proceeding where Bay State's service quality and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Internal communications regarding this matter throughout the NiSource organization would have been and were proper for the reasons stated below and are not relevant to this proceeding except to satisfy idle curiosity.

Notwithstanding this objection, but rather specifically maintaining it, Bay State will state that this Sen. Marc Pacheco's hearing was of reasonable concern to all at Bay State, given that Bay State has not been the subject of legislative hearings in recent memory. Accordingly, the process was given the respect and deference it appropriately commands and its progress and outcome were conveyed as one would expect throughout NiSource senior management.

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

- UWUA 1-9: (a) Has Bay State maintain that at any time since November 1997, but excluding the filing it made on April 18, 2006 in this docket, the company has sought the permission of the Department to engage in any staffing level cutbacks below the levels that existed in November 1997? If yes, please produce a copy of any and all documents that the company considers requests for such permission.
- (b) At any time since November 1997, has the company received the permission of the Department to reduce its staffing levels below the levels that existed in November 1997? If yes, please produce the documents that the company believes amount to such permission.

- RESPONSE: (a) Mr. Bryant believes that no such authorization was requested because Bay State believes and believed that no such authorization is or was required.<sup>1</sup> However, the Department was aware that non-union staff and management positions would be consolidated following consummation of the NIPSCo-Bay State merger. Those positions were in fact subsequently consolidated.
- (b) See the Company's response to (a) above.

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<sup>1</sup> In its January 30, 2002 Letter Order to Bay State Gas in D.T.E. 99-84, the Department directed Bay State to provide staffing level data as part of its Service Quality Plan. However, the Department did not require the Company to establish a staffing level benchmark, which would subsequently require authorization to amend.



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D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

UWUA 1-10: (Ex. BSG-1, p 1) With whom at NiSource does Mr. Bryant “coordinate the regulatory, governmental and business policies of Bay State?” Include names and titles.

RESPONSE: The phrase “coordinate” is unclear and overbroad. Please see Bay State’s response to UWUA-1-1. The referenced areas are central to the safe, proper and low cost operation of a regulated utility such as Bay State. Mr. Bryant is President of Bay State and responsible for each of these areas. Accordingly, consistent with the regular and usual course of his business activities, Mr. Bryant has had contact with virtually every operational and administrative manager in Bay State with regard to the various operational and administrative regulatory policies that impact Bay State, with regard to governmental policies and with regard to the business policies of Bay State. Many employees also would be included in one or more areas. Managers and personnel from Northern Utilities may be included as well because of certain shared services. Managers and employees of NiSource Corporate Services (Finance, HR, Insurance, Tax, Real Estate, Operations, Engineering, etc.) would also fall under multiple portions of this request. Finally, managers of affiliated distribution companies may also be included in a response to this request. In sum, the “names and titles” requested, even if they each could be recalled and compiled with any certainty, would likely number in the hundreds.

COMMONWEALTH OF MASSACHUSETTS  
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D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

UWUA 1-11: Did any Bay State or NiSource employee receive any type of bonus or additional compensation due to either their participation in DTE 05-27 or the result in that docket? If "yes," please provide the amount of the compensation; to whom provided; and the basis for the additional compensation.

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Notwithstanding this objection but rather specifically maintaining it, as testified to in D.T.E. 05-27, employees and managers of Bay State are entitled to incentive compensation and spot awards related to performance under metrics described in that proceeding and subsequently approved by the Department as reasonable. To the extent that performance during 2005 met those defined metrics, incentive compensation and/or spot performance awards would have been awarded.

COMMONWEALTH OF MASSACHUSETTS  
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RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273  
D.T.E. 06-31

Date: June 27, 2006

Responsible: Stephen H. Bryant, President

UWUA 1-12: (Ex. BSG-1, p. 8, l. 20 -28) Has the company since 1997 had the same reading of section 1E(b) as stated by Mr. Bryant in his testimony? If the company has changed its own reading of this statute over time, please provide any different interpretations of the statute that the company has had, and the relevant dates of those interpretations.

RESPONSE: To the best of Mr. Bryant's knowledge, the Company has, since 1997 to date, consistently interpreted section 1E(b) as stated in his testimony, and is not aware of any correspondence indicating a change in this position. It is important to note, however, that Bay State's circumstances have changed since 1997. Prior to the Department's approval of the Company's PBR Plan as part of D.T.E. 05-27, Bay State was neither under a performance based ratemaking plan nor did the Department establish a staffing benchmark, therefore Bay state was not required to obtain permission from the Department to make staffing changes. As noted in its response to UWUA 1-9, the Company was directed by the Department to merely report staffing levels, not to establish a staffing level benchmark.